


FILED

MAY 27 2015

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY  DEPUTY

SEALED

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
MIDLAND-ODESSA DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

V.

1.) MARCUS DWAYNE WILLIS,
2.) CHERYL DENISE MONTGOMERY,
3.) LORENZO ZUBIA,

Defendants.

CRIMINAL NO.
INDICTMENT

MO 15CR - 123

[Vio: 21 U.S.C. § 846 -
Conspiracy;
21 U.S.C. § 841(a)(1)-
Possession With Intent to
Distribute and Distribution of a
Controlled Substance]

THE GRAND JURY CHARGES:

COUNT ONE
[21 U.S.C. § 846]

Beginning on or about August 1, 2014 and continuing until on or about the date of this indictment, in the Western District of Texas and elsewhere, the Defendants,

1.) MARCUS DWAYNE WILLIS,
2.) CHERYL DENISE MONTGOMERY,
3.) LORENZO ZUBIA,

did combine, conspire, confederate and agree together, with each other, and with others known and unknown to the Grand Jury to possess with intent to distribute and distribute a controlled substance, which offense involved five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), in violation of Title 21, United States Code, Section 846.

A TRUE BILL. **Original signed by the
foreperson of the Grand Jury**

~~FOREPERSON OF THE GRAND JURY~~

RICHARD L. DURBIN, JR.
ACTING UNITED STATES ATTORNEY


BRANDI YOUNG
Assistant United States Attorney

PERSONAL DATA SHEET (REDACTED)
 UNITED STATES DISTRICT COURT
 WESTERN DISTRICT OF TEXAS

MO 15 CR - 123

| | | |
|---|---------------------------------------|--------------------|
| COUNTY: Midland | DIVISION: MIDLAND/ODESSA | JUDGE: JUNELL |
| DATE: May 27, 2015 | MAG CT #: | FBI #: |
| CASE NO: MO-15- | ASSISTANT U.S. ATTORNEY: Brandi Young | |
| DEFENDANT: 1. MARCUS DWAYNE WILLIS | | DOB: XXXXXXXXXX |
| ADDRESS: XXXXXXXXXXXXXXXXXXXXXXXX | | |
| CITIZENSHIP: INTERPRETER NEEDED LANGUAGE: | | |
| DEFENSE ATTORNEY: | | |
| DEFENDANT IS: | | |
| DATE OF ARREST: Not arrested | | BENCH WARRANT: XXX |
| PROBATION OFFICER: | | |
| NAME AND ADDRESS OF SURETY: | | |
| YOUTH CORRECTIONS ACT APPLICABLE: No | | |
| PROSECUTION BY: Indictment | | |
| OFFENSE (Code and Description): Ct. 1 -- 21 USC 846 - Conspiracy | | |
| OFFENSE IS: FELONY | | |
| MAXIMUM SENTENCE: Ct. 1 - A 10 year mandatory minimum term of imprisonment, not to exceed life; a 5 year mandatory minimum term of supervised release; a fine not to exceed \$10 million; and a mandatory \$100 special assessment. | | |
| PENALTY IS MANDATORY: As stated above. | | |
| REMARKS: AGENT: FBI – Dominic Coppo | | |

WDT-Cr-3

PERSONAL DATA SHEET (REDACTED)
 UNITED STATES DISTRICT COURT
 WESTERN DISTRICT OF TEXAS

MO15CR-123

| | | |
|---|---------------------------------------|--------------------|
| COUNTY: Midland | DIVISION: MIDLAND/ODESSA | JUDGE: JUNELL |
| DATE: May 27, 2015 | MAG CT #: | FBI #: |
| CASE NO: MO-15-CR- | ASSISTANT U.S. ATTORNEY: Brandi Young | |
| DEFENDANT: 2. CHERYL DENISE MONTGOMERY | | DOB: XXXXXXXXXX |
| ADDRESS: XXXXXXXXXXXXXXXXXXXX | | |
| CITIZENSHIP: INTERPRETER NEEDED LANGUAGE: | | |
| DEFENSE ATTORNEY: | | |
| DEFENDANT IS: | | |
| DATE OF ARREST: Not arrested | | BENCH WARRANT: XXX |
| PROBATION OFFICER: | | |
| NAME AND ADDRESS OF SURETY: | | |
| YOUTH CORRECTIONS ACT APPLICABLE: No | | |
| PROSECUTION BY: Indictment | | |
| OFFENSE (Code and Description): Ct. 1 – 21 USC 846 - Conspiracy | | |
| OFFENSE IS: FELONY | | |
| MAXIMUM SENTENCE: Ct. 1 - A 10 year mandatory minimum term of imprisonment, not to exceed life; a 5 year mandatory minimum term of supervised release; a fine not to exceed \$10 million; and a mandatory \$100 special assessment. | | |
| PENALTY IS MANDATORY: As stated above. | | |
| REMARKS: AGENT: FBI – Dominic Coppo | | |

WDT-Cr-3

PERSONAL DATA SHEET (REDACTED)
UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS

MO 15 CR - 123

| | | |
|---|---------------------------------------|--------------------|
| COUNTY: Midland | DIVISION: MIDLAND/ODESSA | JUDGE: JUNELL |
| DATE: May 27, 2015 | MAG CT #: | FBI #: |
| CASE NO: MO-14-CR-296 | ASSISTANT U.S. ATTORNEY: Brandi Young | |
| DEFENDANT: 3. LORENZO ZUBIA | | DOB: XXXXXXXXXX |
| ADDRESS: XXXXXXXXXXXXXXXXXXXXX | | |
| CITIZENSHIP: INTERPRETER NEEDED LANGUAGE: | | |
| DEFENSE ATTORNEY: | | |
| DEFENDANT IS: | | |
| DATE OF ARREST: Not arrested. | | BENCH WARRANT: XXX |
| PROBATION OFFICER: | | |
| NAME AND ADDRESS OF SURETY: | | |
| YOUTH CORRECTIONS ACT APPLICABLE: No | | |
| PROSECUTION BY: Indictment | | |
| OFFENSE (Code and Description): Ct. 1 – 21 USC 846 - Conspiracy | | |
| OFFENSE IS: FELONY | | |
| MAXIMUM SENTENCE: Ct. 1 - A 10 year mandatory minimum term of imprisonment, not to exceed life; a 5 year mandatory minimum term of supervised release; a fine not to exceed \$10 million; and a mandatory \$100 special assessment. | | |
| PENALTY IS MANDATORY: As stated above. | | |
| REMARKS: AGENT: FBI – Dominic Coppo | | |

WDT-Cr-3